

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SKYLINE STEEL, LLC, : Civil Action No. 13 Civ. 8171 (JMF)  
Plaintiff, : JURY TRIAL REQUESTED  
v. :  
PILEPRO, LLC, :  
Defendant. :  
\_\_\_\_\_ x

**NOTICE OF MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR**

**DEFENDANT PILEPRO, LLC**

PLEASE TAKE NOTICE that Larry R. Laycock, David R. Wright, Tyson K. Hottinger, and Bret D. Tingey of the firm Maschoff Brennan Laycock Gilmore Israelsen & Wright, PLLC (collectively, “Maschoff Brennan”) will move before the Honorable Jesse Furman, at the United States District Court for the Southern District of New York, located in the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, for an order pursuant to Rule 1.4 of the Local Civil Rules of the United States District Court for the Southern and Eastern Districts of New York granting them leave to withdraw as counsel of record for Defendant PilePro, LLC (“PilePro”).

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Maschoff Brennan submits the accompanying Memorandum of Law, dated January 29, 2015, and the Declaration of Bret D. Tingey, dated January 29, 2015.

PLEASE TAKE FURTHER NOTICE that opposition papers, if any, to Maschoff Brennan's motion, shall be served and filed pursuant to Local Civil Rule 6.1(b) or as otherwise ordered by the Court.

Dated: January 29, 2015

By: /s/ Bret D. Tingey

Larry R. Laycock  
David R. Wright  
Tyson K. Hottinger  
Bret D. Tingey  
MASCHOFF BRENNAN  
201 South Main Street, Suite 600  
Salt Lake City, Utah 84111  
&  
20 Pacifica, Suite 1130  
Irvine, California 92618

*Attorneys for Defendant and  
Counterclaimant PilePro, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 29<sup>th</sup> day of January, 2015, I served a true and correct copy of the NOTICE OF MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR DEFENDANT PILEPRO, LLC, MEMORANDUM OF LAW IN SUPPORT OF MASCHOFF BRENNAN'S MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR DEFENDANT PILEPRO, LLC, DECLARATION OF BRET D. TINGEY IN SUPPORT OF MASCHOFF BRENNAN'S MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR DEFENDANT PILEPRO, LLC, and (PROPOSED) ORDER GRANTING PERMISSION TO WITHDRAW AS COUNSEL FOR DEFENDANT PILEPRO, LLC PILEPRO, LLC upon PilePro, LLC via FedEx overnight service to 100 Congress Avenue, Suite 2100, Austin Texas 78701 as well as all counsel of record identified below via electronically filing with the Clerk of Court using the CM/ECF system which sent Notification of such filing to the following:

**PilePro, LLC**  
100 Congress Avenue, Suite 2100  
Austin Texas 78701

**Aldo A Badini**  
Email: [abadini@winston.com](mailto:abadini@winston.com)

**Alexandra Bridget McTague**  
Email: [amctague@winston.com](mailto:amctague@winston.com)

**Jay Laurie Lazar**  
Email: [AttorneyJLazar2014@verizon.net](mailto:AttorneyJLazar2014@verizon.net)

**Jenna Weis Logoluso**  
Email: [jlogoluso@winston.com](mailto:jlogoluso@winston.com)

**Merritt Diane Westcott**  
Email: [mwestcott@winston.com](mailto:mwestcott@winston.com)

**Susannah Providence Torpey**  
Email: [storpey@winston.com](mailto:storpey@winston.com)

**Micah F McBride**  
Email: [micah@shumwayvan.com](mailto:micah@shumwayvan.com)

**Michael C Van**  
Email: [michael@shumwayvan.com](mailto:michael@shumwayvan.com)

**Robert T Spjute**  
Email: [tee@shumwayvan.com](mailto:tee@shumwayvan.com)

**Gregory W Shulz**  
Email: [gregory@shumwayvan.com](mailto:gregory@shumwayvan.com)

Signature: /s/ Bret D. Tingey